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Attorneys for Defendant and Counterclaimant
 TWIN CITY FIRE INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CROWLEY MARITIME CORPORATION,)	Case No. CV-08-00830 SI
)	
Plaintiff,)	[Hon. Susan Illston]
)	
vs.)	STIPULATION TO FILE DOCUMENTS
)	UNDER SEAL PURSUANT TO JUDGE
FEDERAL INSURANCE COMPANY; TWIN)	ILLSTON'S STANDING ORDER, CIVIL
CITY FIRE INSURANCE COMPANY; RLI)	L.R. 79-5, CIVIL L.R. 7-12, AND THE
INSURANCE COMPANY; and DOES 1-20,)	PARTIES' STIPULATED PROTECTIVE
inclusive,)	ORDER; [PROPOSED] ORDER
)	
Defendants.)	
)	Date: November 14, 2008
)	Time: 9:00 a.m.
)	Ctrm: 10
)	
)	[Declaration of Rachael Shook filed
)	concurrently herewith]
)	

STIPULATION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO JUDGE ILLSTON'S STANDING
 ORDER, CIVIL L.R. 79-5, CIVIL L.R. 7-12, AND THE PARTIES' STIPULATED PROTECTIVE ORDER;
 [PROPOSED] ORDER

(Case No. 08-0830 SI)

Pursuant to the Honorable Susan Illston's Standing Order, Civil L.R. 79-5, Civil L.R. 7-12, and the Stipulated Protective Order submitted by the parties and entered by the Court in this action on August 13, 2008 (the "Protective Order"), Plaintiff and Counterdefendant Crowley Maritime Corporation ("Crowley"), Defendant Federal Insurance Company, Defendant and Counterclaimant Twin City Fire Insurance Company, and Defendant RLI Insurance Company, (collectively, the "Parties"), by and through their respective counsel of record, hereby stipulate and agree as follows:

The Parties have stipulated to a Protective Order which provides that the Parties may designate certain materials "confidential." In discovery in the instant matter, Crowley produced documents so designated (the "Sealable Materials").

The Parties have submitted currently-pending cross Motions for Summary Judgment and may wish to use Sealable Materials in support of their respective Oppositions.

Each of the Parties will separately lodge the Sealable Materials that each intends to be filed under seal pursuant to the provisions of the Protective Order and the procedures set forth in Judge Illston's Standing Order.

This Stipulation, and the filing of documents under seal pursuant thereto, shall not constitute acknowledgement that the documents marked "confidential" or filed under seal are, in fact, properly designated confidential. The Parties reserve the right to contest, as provided in the attached Protective Order, the confidentiality of any documents marked "confidential."

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STIPULATION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO JUDGE ILLSTON'S STANDING ORDER, CIVIL L.R. 79-5, CIVIL L.R. 7-12, AND THE PARTIES' STIPULATED PROTECTIVE ORDER;
[PROPOSED] ORDER

(Case No. 08-0830 SI)

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
Los Angeles, California 90067-3086

Respectfully submitted,

Dated: October 14, 2008

PILLSBURY & LEVINSON, LLP
COVINGTON & BURLING LLP

By: /s/ Michael S. Greenberg
G.O. 45.X.B. authorization obtained
MICHAEL S. GREENBERG
Attorneys for Plaintiff and Counterdefendant
Crowley Maritime Corporation

Dated: October 14, 2008

RUDLOFF WOOD & BARROWS LLP
HOGAN & HARTSON LLP

By: /s/ Kevin A. Norris
G.O. 45.X.B. authorization obtained
KEVIN A. NORRIS
Attorneys for Defendant Federal Insurance
Company

Dated: October 14, 2008

STROOCK & STROOCK & LAVAN LLP
By: /s/ Richard R. Johnson
RICHARD R. JOHNSON
Attorneys for Defendant and
Counterclaimant Twin City Fire Insurance
Company

Dated: October __, 2008

MORISON ANSA HOLDEN ASSUNCAO
& PROUGH, LLP

By: _____
BRIAN E. SIMS
Attorneys for Defendant RLI Insurance
Company

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____



Hon. Susan Illston

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STIPULATION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO JUDGE ILLSTON'S STANDING
ORDER, CIVIL L.R. 79-5, CIVIL L.R. 7-12, AND THE PARTIES' STIPULATED PROTECTIVE ORDER;
[PROPOSED] ORDER

(Case No. 08-0830 SI)

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
Los Angeles, California 90067-3086

Respectfully submitted,

Dated: October , 2008

PILLSBURY & LEVINSON, LLP
COVINGTON & BURLING LLP

By: _____

MICHAEL S. GREENBERG
Attorneys for Plaintiff and Counterdefendant
Crowley Maritime Corporation

Dated: October , 2008

RUDLOFF WOOD & BARROWS LLP
HOGAN & HARTSON LLP

By: _____

KEVIN A. NORRIS
Attorneys for Defendant Federal Insurance
Company

Dated: October _ , 2008

STROOCK & STROOCK & LAVAN LLP

By: _____

RICHARD R. JOHNSON
Attorneys for Defendant and
Counterclaimaint Twin City Fire Insurance
Company

Dated: October 10 2008

MORISON ANSA HOLDEN ASSUNCAO
& PROUGH, LLP

By: _____

BRIAN E. SIMS
Attorneys for Defendant RLI Insurance
Company

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Susan Illston

STIPULATION TO FILE DOCUMENTS UNDER SEAL AND [PROPOSED] ORDER
- Case No. 08-0830 SI

PROOF OF SERVICE

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2
3 **STATE OF CALIFORNIA**)
4 **COUNTY OF LOS ANGELES**) ss

5 I am employed in the County of Los Angeles, State of California, over the age of eighteen
6 years, and not a party to the within action. My business address is: 2029 Century Park East, Suite
7 1800, Los Angeles, California 90067-3086. On October 14, 2008, I served the foregoing
8 document(s) described as: **STIPULATION TO FILE DOCUMENTS UNDER SEAL**
9 **PURSUANT TO JUDGE ILLSTON'S STANDING ORDER, CIVIL L.R. 79-5, CIVIL L.R.**
10 **7-12, AND THE PARTIES' STIPULATED PROTECTIVE ORDER; [PROPOSED] ORDER**
11 on the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes
12 addressed as follows:

See Service List Attached

- 13
14
15 ☐ **(VIA U.S. MAIL)** In accordance with the regular mailing collection and processing
16 practices of this office, with which I am readily familiar, by means of which mail is
17 deposited with the United States Postal Service at Los Angeles, California that same
18 day in the ordinary course of business, I deposited such sealed envelopes, with
19 postage thereon fully prepaid, for collection and mailing on this same date following
20 ordinary business practices, addressed as set forth below.
21 ☐ **(VIA OVERNIGHT DELIVERY)** By causing such envelope to be delivered to the
22 office of the addressee(s) at the address(es) set forth above by overnight delivery via
23 Federal Express or by a similar overnight delivery service.
24 ☒ **(VIA E-MAIL)** By causing document(s) be delivered via electronic email to the
25 office of the addressee(s) at the email address(es) provided to the court..

26 I declare that I am employed in the office of member of the bar of this court under whose
27 direction the service was made. I declare under penalty of perjury under the laws of the State of
28 California that the above is true and correct. Executed on October 14, 2008 at Los Angeles,
California.

Dino Shorté
[Type or Print Name]

/s/ Dino Shorté
[Signature]

[PROPOSED] ORDER GRANTING TWIN CITY AND RLI'S MOTION TO STRIKE EVIDENCE SUBMITTED
WITH PLAINTIFF 'S MOTION FOR SUMMARY JUDGMENT

(Case No. 08-00830-SI)

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SERVICE LIST

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STIPULATION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO JUDGE ILLSTON'S STANDING
ORDER, CIVIL L.R. 79-5, CIVIL L.R. 7-12, AND THE PARTIES' STIPULATED PROTECTIVE ORDER;
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